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**Form ADV Part 2A
Brochure**

This brochure provides information about the qualifications and business practices of The Moorings Group, LLC. If you have any questions about the contents of this Brochure, please contact us at (770) 395-3366 and/or connie@mooringsgroup.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about The Moorings Group, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for The Moorings Group, LLC is 129403.

Any references to The Moorings Group, LLC as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.

Item 2 Material Changes

At least annually, this section will discuss only specific material changes that are made to The Moorings Group Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Since our last annual updating amendment dated February 7, 2023, we have the following material changes to report.

June 2023

- Item 12 was amended to further disclose our cross trade pricing methodologies and associated costs.
- Item 15 was amended to disclose custody of client assets due to Standing Letters of Authorization.

A copy of our updated Brochure may be requested by contacting us at (770) 395-3366 and/or connie@mooringsgroup.com. Our Brochure is available to you free of charge.

Additional information about The Moorings Group is also available via the SEC's web site www.adviserinfo.sec.gov. The IARD number for The Moorings Group is 129403. The SEC's web site also provides information about any persons affiliated with The Moorings Group who are registered, or are required to be registered, as Advisory Representatives of The Moorings Group.

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Item 4 Advisory Business

A. The Moorings Group is an independent asset management firm founded in 2003 and wholly owned by its investment professionals. We are a limited liability company formed under the laws of the State of Georgia and filed for investment adviser registration with the Securities and Exchange Commission in February 2005. Our firm's equal owners and their roles and responsibilities are as follows:

- Michele M. Poirier, Partner and Chief Investment Officer - Portfolio management, credit and risk management and client service
- Connie. F. Partridge, Partner and Chief Operating and Compliance Officer - Portfolio management, client service, compliance, and operations

The firm's investment professionals, Michele Poirier and Connie Partridge have, individually, over 35 years of experience within the fixed income markets. Additional business information about Michele and Connie is disclosed in the Supplemental Brochures known as Part 2B.

B. The Moorings Group designs and actively manages custom portfolios for clients. We specialize in the fixed income asset class with a primary focus on municipals. We operate from a core belief in the added value created from the active management of fixed income portfolios.

We also manage a limited number of balanced portfolios.

The investment recommendations and advice offered by The Moorings Group are not legal or accounting advice. We encourage clients to coordinate and discuss the impact of financial advice with their attorney and/or accountant.

C. The Moorings Group manages portfolios which are customized to meet your individual needs. We will consult with you and/or your primary adviser to understand your financial history, goals, objectives and/or concerns. In addition, we perform an initial evaluation to determine your risk profile, current and future income and liquidity needs and tax considerations. Based on the information obtained from this consultation and evaluation, we will build a portfolio designed around your individual circumstances and unique risk/return requirements. Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflict with the advice we give to other clients regarding the same security or investment.

When our firm is working as a sub-adviser or as an investment manager in a wrap program, we will rely on any client specific information provided by your primary adviser and will manage your portfolio based on your selected investment strategy.

You may request trading limitations within the selected investment strategy based on your specific needs or preferences.

D. The Moorings Group is a fixed income investment manager for the "Advisor's Choice Separately Managed Account Program". We manage these accounts using the same processes and disciplines as other "non-wrap" fixed income accounts. We customize each portfolio based on the needs of the individual client as represented by the wrap sponsor's representative (client's primary adviser). The selected investment strategy for an account is managed to the same performance benchmark as "non-wrap" accounts unless otherwise requested by the client or their primary adviser. This program includes accounts of smaller sizes which may result in a broader range of portfolio durations and reduced liquidity. The Moorings Group is compensated by the wrap program sponsor with a portion of the wrap fee.

E. As of December 31, 2023, our firm had discretionary assets under management of approximately \$478.1 Million.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Item 5 Fees and Compensation

A. Our fees are based on a percentage of the value of your assets under management as of a specified date. Our fees are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in your account. The Moorings Group will receive compensation for managing your portfolio based on the following fee schedules:

Balanced Portfolios for Direct Clients:

Account Size	Annual Fee
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$2,999,999,999	.75%
\$3,000,000 to \$4,999,999,999	.50%
\$5,000,000 to \$14,999,999,999	.35%
\$15,000,000 and above	Negotiable

Fixed Income Portfolios for Direct Clients:

Account	Annual Fee
\$500,000 to \$999,999	.50%
\$1,000,000 to \$2,999,999	.40%
\$3,000,000 to \$4,999,999	.36%
\$5,000,000 to \$14,999,999	.25%
\$15,000,000 and above	.20%

Sub-Advisory Fixed Income Portfolios:

Account Size	Annual Fee
\$500,000 to \$999,999	.25%
\$1,000,000 to \$4,999,999	.22%
\$5,000,000 to \$9,999,999	.20%
\$10,000,000 and above	.15%

We sometimes make exceptions to our general fee schedule. The Moorings Group negotiates lower fees based on the size of the portfolio or such other factors as we determine and in our sole discretion. Fee reductions or waivers are available to our firm's personnel and family members.

You may make additions to or withdrawals from your account provided it continues to meet our minimum account size requirements. For Moorings Group direct accounts, additional assets deposited into an account after it is opened which represent 10% or more of total account assets will be charged a pro-rata fee based upon the number of days remaining in the then current calendar quarter. Assets withdrawn from an account after it is opened which represent 10% or more of total account assets will be charged a pro-rata fee based on the number of days in the calendar quarter up to the withdrawal date. No fee adjustments will be made for account appreciation or depreciation. If your account falls below the minimum account size requirement, The Moorings Group reserves the right to terminate our advisory services. Withdrawals from your account can affect our ability to manage your account due to reduced ability to diversify the account.

See Item 5(D) for the billing information on sub-advisory and wrap program accounts.

B. For Moorings Group direct accounts, advisory fees are calculated as of the end of each calendar quarter based on the ending value of your account as provided by the account custodian. Fees will be charged to and collected directly from your account in the following quarter, provided you have given The Moorings Group and the custodian written authorization to debit the fee. Your custodial account statement will reflect the deduction of your quarterly advisory fees. You or your primary adviser may also receive a fee statement from The Moorings Group. Except for ERISA and IRA accounts, you may reimburse your account for advisory fees paid to The Moorings Group.

See Item 5(D) for the billing information on sub-advisory and wrap program accounts.

C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your non-wrap fee account in accordance with the custodian's transaction fee schedule. You may also pay fees for custodial services, account maintenance fees, and other fees associated with maintaining the account. These fees are not charged by The Moorings Group but are charged by

the account custodian. The Moorings Group does not share in any portion of these fees. Additionally, on any mutual fund purchased, you will pay your proportionate share of a fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee. These advisory fees are not shared with The Moorings Group and are compensation to the fund manager. See Item 8(B) for additional information on mutual fund investments.

See Item 12 "Brokerage Practices" for additional information.

D. The Moorings Group bills client fees in arrears for both The Moorings Group direct accounts and sub-advisory accounts where our firm is authorized to debit fees directly from the account.

When acting in a sub-advisory capacity or as an investment manager in a wrap program, the primary adviser or the wrap program sponsor can be responsible for fee calculation and debiting from the account. Under these circumstances, The Moorings Group will share in the fees based on the primary adviser/wrap sponsor's billing policies and procedures, including but not limited to calculation method, billing cycle and cash flows.

For client portfolios where we are acting as a sub-adviser or as an investment manager through a wrap program, and if the primary adviser charges asset management fees in advance, the primary adviser and/or wrap program sponsor's agreement with The Moorings Group and/or the primary adviser/wrap program sponsor's agreement with the Client will dictate the procedures and notifications required for termination of our services and any adjustment of fees.

E. Neither The Moorings Group nor any Advisory Representatives of The Moorings Group accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6 Performance-Based Fees and Side by Side Management

The Moorings Group does not charge performance-based fees and therefore does not engage in side-by-side management.

Item 7 Types of Clients

The Moorings Group offers asset management services to individuals, trusts, estates, charitable organizations, corporations, foundations, municipalities and other business entities.

If you wish to engage The Moorings Group for advisory services, you will execute an Investment Advisory Agreement with our firm. The Moorings Group advisory agreement outlines the responsibilities of you and The Moorings Group as well as any authorizations granted to our firm with regard to the management of your portfolio(s). You are required to establish an account with a qualified custodian and deposit cash, cash equivalents and/or securities to that account. See Item 15 on "Custody" for additional information.

Clients of a primary adviser who have selected The Moorings Group as a sub-adviser and clients of the wrap program sponsor will normally execute agreements with those firms and may or may not have a direct contract with The Moorings Group.

The Moorings Group will generally require a minimum of \$500,000 in account assets in order to provide investment advisory services. In our sole discretion, we will waive the minimum account size requirement and accept accounts valued at less than \$500,000 if the client plans to add additional

assets in the future and/or the client has other accounts (or related accounts) already managed by our firm. You may make withdrawals from an account provided that the account assets continue to meet the minimum account size requirements. If an account falls below the minimum account size requirement, we reserve the right to terminate advisory services.

Clients with assets under management of less than \$500,000 are advised that portfolio performance may suffer due to the difficulties associated with sufficiently diversifying smaller accounts.

The Moorings Group may have different minimum account requirements when participating as an investment manager in a wrap program or when acting as a sub-adviser.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

A. The Moorings Group specializes in custom fixed income portfolio management within the following investment strategies:

- Intermediate tax-exempt municipal
- Intermediate core fixed income
- Intermediate single state tax-exempt municipal
- Tax aware cash management

We actively manage each client's fixed income portfolio using the following 4 step process:

1. Client evaluation: After completing the client evaluation described in Item 4(C), we will select an appropriate performance benchmark for each portfolio based on the risk profile and/or income requirements of each individual client.
2. Market assessment and interest rate trend analysis: Prior to constructing an initial portfolio and as a component of our ongoing active management process, we perform a "macro" investment environment analysis by examining economic fundamentals and market technicals.
3. Portfolio design and execution: We select securities for purchase/sale based on interest rate trend analysis and specific security features (discount or premium, maturity, "call" or "put" features, enhancements, issuer creditworthiness, yield spread compared to appropriate benchmark securities and option-adjusted spreads), screen new issue and secondary markets, and buy or sell the most appropriate securities for the client's portfolio.
4. Portfolio review: Risk analysis is an important component of active management and is derived from an assessment and review of various portfolio attributes including duration, issuer/sector exposures and performance. Each portfolio's profile and performance for the selected period are compared to the designated benchmark index, followed by an examination of how the portfolio performed and the contributing factors to that performance. We also monitor the designated benchmark for pertinent changes and then determine if any adjustments should be made to a client's portfolio.

Investing in securities involves risk of loss, including the potential loss of the principal money you are investing. Therefore, your participation in any of the investment strategies offered by The Moorings Group requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts. Market values of investments will always fluctuate based on market conditions.

B. As a component of the overall risk management process (see Item 8(A:3&4), The Moorings Group performs municipal bond credit analysis on current portfolio holdings and prospective securities to be purchased. Using a multi-level process, we make our credit quality determinations by examining the following:

- *regional/state environment (economic base concentration/diversity, demographics, governmental policy)
- *sector assessment (fundamentals, supply, governmental policy)
- * issuer quality (budgetary discipline, debt service burden, reserve levels)

We do not represent, warrant or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms or insulate you from losses due to major market corrections. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by The Moorings Group or our Advisory Representatives will provide a better return than other investment strategies.

As previously stated, The Moorings Group uses mutual funds and ETFs in some client portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers and/or the fund straying from its stated investment objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails or emails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request, The Moorings Group will direct the client to the appropriate Web page to access the prospectus.

The risks with ETFs include the fact that actively traded ETFs can create increased trading expenses and fees and the intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. In addition, an ETF more heavily weighted towards a particular market sector may be more volatile over short and long periods of time than a more broadly diversified ETF.

Item 9 Disciplinary Information

There is no reportable disciplinary information for The Moorings Group or its management persons.

Item 10 Other Financial Industry Activities and Affiliations

A., B. The Moorings Group does not have a related person who is a: broker-dealer or other similar type of broker or dealer, investment company or other pooled investment vehicle, other investment adviser or financial planner, futures commission merchant or commodity pool operator, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, or sponsor or syndicator of a limited partnership.

C. The Moorings Group nor its management persons has a relationship with any of the following entities: broker-dealer, municipal securities dealer, or government securities broker-dealer, investment company or other pooled investment vehicle, other investment adviser or financial planner, futures commission merchant, commodity pool operator or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor syndicator of limited partnerships. The Moorings Group and its Advisory Representatives are not actively engaged in any other financial industry entity.

D. The Moorings Group may recommend the services of other investment advisers to our Clients, but we do not receive compensation related to any such referral.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. The Moorings Group will uphold the highest standards of professional conduct in all facets of its business activities as an investment adviser. We acknowledge our fiduciary obligation to:

- *act with integrity and in an ethical manner when interacting with clients, prospective clients and the public;
- *place the interests of clients and the integrity of the investment profession above any personal interests;
- *comply with the spirit and the letter of all federal securities laws.

The Moorings Group maintains a Code of Ethics for its Advisory Representatives, supervised persons and office staff ("associated persons"). The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

B. Neither The Moorings Group nor any of our associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.

C. The Moorings Group and its associated persons may buy or sell securities identical to those securities bought or sold for your portfolio(s). Therefore, The Moorings Group and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold for you. We will not put our interests before your interests and neither The Moorings Group nor any associated person will trade ahead of you or trade in such a way as to obtain a better price for ourselves than for you or other clients. No affiliated person may trade in a client's account in such a way as to disadvantage any client.

D. The Moorings Group is required to maintain a list of all securities holdings for its associated persons at least quarterly. Our firm is also responsible for developing procedures to supervise the trading activities of all associated persons (and their related family accounts) that have knowledge of your transactions. Further, associated persons are prohibited from trading on non-public information or sharing such information.

Item 12 Brokerage Practices

A. As stated in our investment advisory agreement, The Moorings Group has sole discretion to select broker-dealers for executing client portfolio transactions.

On fixed income transactions, we will transact with broker-dealers who have expertise in the fixed income markets, are active as primary underwriters or secondary market makers, and who are suitable for trade execution due to the integrity, financial strength and stability of their firm. We will seek to obtain best execution for all client accounts by taking into account all relevant factors at the time of the trade, including the features of the individual security, the offering or bid price and prevailing market conditions.

For our clients' accounts where Schwab serves as the custodian, Schwab generally does not charge separately for custody services but is compensated by charging commissions or transaction fees on trades that it executes or that settle into your Schwab account. See Item 5(C) "Fees" and Item 15 "Custody" for additional information.

If appropriate, we may cross securities between managed accounts. We will make the decision to cross trades based on the needs of the selling and buying account(s). Cross trades are utilized to realize cost savings to Clients by reducing the bid/ask spread on a transaction.

The Moorings Group always uses a non-affiliated broker-dealer to execute both sides of the trade and will not receive any transaction-based compensation from the cross trade. We attempt to achieve "best execution" for client accounts by determining the "fair market value" of the security and attempt to assure that no account is disfavored by the trade.

To establish the "fair market value" of the security, The Moorings Group considers one or a combination of the following:

- 1- a competitive bid on the security
- 2- a bid/ask evaluation from a broker-dealer
- 3- a securities pricing/evaluation service
- 4- a similar security (credit and structure) valuation

Fair market value is typically determined by averaging 3 prices obtained from the following: (1) an evaluation from a broker-dealer of the offering side; (2) the last evaluation from the custodian's pricing service; and (3) a bid side evaluation from the Bloomberg evaluation service (BVAL). The average price is used for the client buy side and a minimal ticket charge is subtracted from that price to determine the sell side price. The Moorings Group will negotiate with the executing broker to minimize the transactions costs associated with cross trades.

The Moorings Group shall not affect a cross trade for clients unless: (1) it has determined that no client will be disfavored by the cross trade and (2) the trade is effected at a price determined by an independent pricing mechanism and such pricing mechanism is documented as to each cross trade.

We will normally execute equity and mutual fund transactions through the client account's custodian. Commission rates on these securities may be higher or lower at the client's custodian than at other broker-dealers or other qualified custodians.

B. We will aggregate the purchase or sale of securities for various client accounts when appropriate. We will primarily use individual fixed income securities, exchange traded funds and mutual funds in managing client accounts. Exchange traded funds and mutual fund transactions should experience no allocation disadvantages.

When executing an aggregated order on a fixed income security and receiving less than a 100% allocation, we will take the following factors into consideration when selecting the specific portfolios for allocation: cash balance, duration, sector, credit quality and diversification needs, and appropriate position block size. If an employee-related account is part of the aggregate order, non-related client accounts will be given priority in the allocation process.

Item 13 Review of Accounts

A. On at least a monthly basis, all managed portfolios are reviewed by the portfolio manager and the Chief Investment Officer. The review process is described in Item 8 (step 4).

B. Client portfolios will be reviewed at a different interval when triggered by a change in the individual client's circumstances or financial, regulatory or policy events that could have an impact on the fundamental credit quality of a security or sector. Clients are advised that they should promptly notify The Moorings Group of any changes to the client's financial goals, objectives, or circumstances. We will use the updated information as we review the portfolio to determine if any changes are warranted.

C. The Moorings Group will contact you (our direct Client) on an annual basis to request the opportunity to discuss your investment portfolio and to update your financial information/objectives should any changes have occurred. You may also request this information at a time interval of your choice. For sub-advisory or wrap program Clients, we will make available a written report for your primary advisor upon request which can facilitate the discussion of your portfolio's composition and performance. You will also be provided statements at least quarterly direct from the account custodian. You should compare the report provided by our firm with statements received directly from the account custodian. Should there be any discrepancy, the account custodian's report will prevail.

Item 14 Client Referrals and Other Compensation

A. We receive an economic benefit from Schwab and other client account custodians in the form of support products and services which are made available to us and other advisors whose clients maintain their accounts with each custodian. Specifically, Schwab provides us and our clients with access to its institutional brokerage platform (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Some of these services help us manage or administer our clients' accounts, while others help us manage and grow our business. The availability of these services is not dependent on the generation of any minimum amount of transaction fees or commissions nor on the execution of any specific security transactions.

See Item 15 "Custody" for additional information.

B. We directly compensate non-employee (outside) consultants, individuals, and/or entities (solicitors) for client referrals. In order to receive a cash referral fee from us, solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to us by a solicitor, you should have received a copy of this brochure along with the solicitor's disclosure statement at the time of the referral. If you become a client, the solicitor that referred you to us will receive either a one-time fixed referral fee at the time you enter into an advisory agreement with us or a percentage of the advisory fee you pay us for as long as you are our client, or until such time as our agreement with the solicitor expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a solicitor are contingent upon your entering into an advisory agreement with us. Therefore, a solicitor has a financial incentive to recommend us to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain us for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our solicitors disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the solicitor's compensation is less favorable.

Item 15 Custody

When engaging The Moorings Group as an investment manager, clients must establish an account with a qualified custodian (bank or broker-dealer). Once an account is established, you will deposit cash, cash equivalents and/or securities to the account. If the client does not have an existing relationship with a qualified custodian, The Moorings Group may recommend that client establish an account with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, and member of SIPC. If selected by the Client to act as a qualified custodian, Schwab will maintain custody of Client's assets and facilitate the execution, clearing and settling of transactions. The Moorings Group is independently owned and operated and is not affiliated with Schwab.

The client may choose a qualified custodian of their choice provided that the following conditions are met:

1. Moorings Group can establish a relationship with the requested custodian.
2. Moorings Group must be granted authorization to trade and deduct advisory fees from the client account.

The Moorings Group does not have physical custody of any client funds or securities. However, under government regulations, we are deemed to have constructive custody of your assets if you authorize us to instruct your custodian to deduct our advisory fees directly from your account. Your custodian maintains the actual custody of your assets. The custodian will be responsible for sending account statements directly to the client's address of record/email on at least a quarterly basis. You should review the statements carefully and promptly when you receive them. Please see Item 5 for more information regarding the deduction of advisory fees from client accounts. As noted under Item 13C above, you should compare any report that we provide you with your account custodian statement.

Standing Letters of Authorization

The Moorings Group is deemed to have custody when a standing letter of instruction or other similar asset transfer authorization arrangement (hereafter "SLOA") is established by a client with a qualified custodian under which the Company is authorized to transfer or otherwise disburse assets to a third-party without obtaining written client consent for each separate, individual transaction. An adviser with authority to conduct such third-party transfers on a client's behalf has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third-party's name and address or account number at a custodian;
2. You authorize us in writing, either on the qualified custodian's form or separately, to direct transfers to the third-party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review or other method to verify your authorization) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction to the qualified custodian;
5. We have no authority or ability to designate or change the identity of the third-party, the address, or any other information about the third-party contained in your instruction;
6. The Moorings Group maintains records showing that the third-party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria and are not subject to a surprise audit.

Item 16 Investment Discretion

The Moorings Group offers asset management services on a discretionary basis. As stated in the Investment Advisory Agreement executed between our firm and each client (or between a primary adviser and our mutual client), The Moorings Group has full discretion to supervise, manage and direct the assets in your portfolio and to purchase/sell securities as deemed appropriate based on your individual investment objectives and/or your selected investment strategy as described in the Investment Advisory Agreement. The Moorings Group will take into consideration any specific limitations you may request due to tax consequences or income needs.

Item 17 Voting Client Securities

The firm manages Client portfolios consisting primarily of fixed income securities for which proxy voting is not applicable. However, the firm may be delegated with proxy voting authority by a Client (as per the Client account custodian application or other documentation) and/or the firm may provide voting recommendations and suggestions to Clients who opt to vote their own proxy statements regarding applicable securities.

The firm will vote all client securities in the best interest of the Client and will disclose if there are any potential conflicts of interest to voting client securities as related to the firm in general or as related to any particular security at the time of proxy voting.

The firm will: (1) adopt and implement written policies and procedures reasonably designed to ensure that client securities are voted in the best interest of the Client; (2) provide a written disclosure statement to Clients who have delegated such authority outlining the firm's processes; (3) deliver a copy of the firm's policies and procedures upon Client request and maintain records of such request and subsequent response; (4) maintain documentation of material information used by the firm in making proxy voting decisions.

Item 18 Financial Information

A. The Moorings Group will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.

B. The Moorings Group has discretionary authority over client accounts; however, that authority does not extend to the withdrawal of any client assets, with the exception of the deduction of The Moorings Group's advisory fees from your accounts. Our firm is financially stable and there is no financial condition that is likely to impair our ability to meet our contractual commitment to you or any other client.

C. Neither The Moorings Group nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Item 19 Requirements for State Registered Advisers

This section is not applicable to The Moorings Group as our firm is not state registered. The Moorings Group is registered with the Securities and Exchange Commission.

Item 20 Additional Information

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.